UNITED STATES DISTRICT COURT DISTRICT OF VERMONT

UNITED STATES OF AMERICA,)	
)	
v.)	
)	
FAHAD HILOWLE)	DOCKET NO. 2:22-cr-85-1
Defendant)	

DEFENDANT'S MOTION FOR PRE-TRIAL RELEASE

Community Connections

Fahad Hilowle was born in Somalia. He came with his family to the U.S. as a refugee in 2003 or 2004 and settled briefly in Tennessee before moving to Maine. Mr. Hilowle resided in Maine until 2016, when he and his family moved to Vermont. Mr. Hilowle became a U.S. citizen in 2011. Prior to his arrest, Mr. Hilowle lived in a studio apartment at 95 North Avenue in Burlington. His brother, Faisal Hilowle, has just moved into the studio apartment. Many of Mr. Hilowle's immediate family still reside here in Chittenden County. For the past eight years, his parents, father Said Hilowle and mother, Fadumo Gabere, have lived in South Burlington at 351 Pearl Street, Apartment 312. His brother, Mahad Hilowle, and sister-in-law Sophia Mohamed live in a two-bedroom apartment at 265 North Winooski Avenue in Burlington. Mahad and Sophia are expecting a baby, but have offered to let Mr. Hilowle stay with them in their second bedroom during the pretrial stage. Mr. Hilowle has two other sisters who live in Vermont. He has a sister in Canada, and two more siblings in Columbus Ohio. Although Mr. Hilowle has a U.S. passport, it is in his parents' possession in South Burlington, and he would willingly turn it over to the Court for the pretrial release stage.

Mr. Hilowle passed his High School Equivalency Diploma Test in Maine in 2013 or 2014, and attended some college at the Community College of Vermont. He is currently

employed by Vermont Employment Agency (VEA). Mr. Hilowle has worked fulltime at VEA for three years, and his boss, who can be reached at (802) 696-9999, has said that Mr. Hilowle can return to his job after his release. Mr. Hilowle is very active in the Muslim community here in Vermont. He attends weekly services. His Imam, Imam Islam Hassan, who can be reached at (612) 965-1149, is willing to attend Court in support of Mr. Hilowle.

Physical/Mental Health

Mr. Hilowle reports that he is in good health, except for persistent sleep issues. He has an upcoming doctor's appointment at the Community Health Clinic on August 15, 2022, to follow up on these issues. Because he has chronic sleep issues, Mr. Hilowle often uses marijuana at night to help him sleep, and so he is likely to test positive for cannabis. Mr. Hilowle disclosed that he tried cocaine once, when he was 18 years old, but has not used drugs since that time. Although Mr. Hilowle has a significant history of alcohol addiction, he is seeking help. He attends regular Alcoholics Anonymous meetings and sees a counselor to help him manage his addiction.

Danger to the Community

Although Mr. Hilowle has a significant criminal history, upon information and belief, many of his past crimes relate to his issues with alcohol. Mr. Hilowle has only missed one Court date, and this was because there was a miscommunication about the date and time of his hearing. Upon learning there was a warrant out for his arrest due to the missed hearing, Mr. Hilowle turned himself in.

Pursuant to Local Rule 7(a)(7), AUSA reports that she opposes release, and is filing a Motion for Detention.

DATED at Burlington, Vermont, this 9th day of August 2022.

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